

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

APPLETON PAPERS INC. and)	
NCR CORPORATION,)	
)	
Plaintiffs,)	
v.)	No. 08-CV-16-WCG
)	
GEORGE A. WHITING PAPER COMPANY,)	
ET AL.,)	
Defendants.)	

NCR CORPORATION,)	
)	
Plaintiff,)	
v.)	No. 08-CV-0895-WCG
)	
KIMBERLY-CLARK CORPORATION,)	
ET AL.,)	
Defendants.)	

NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)

PLEASE TAKE NOTICE that, pursuant to Rules 30(b)(6) of the Federal Rules of Civil Procedure, counsel for Plaintiff NCR Corporation ("NCR") will take the deposition upon oral examination of Paul Montney of Defendant Georgia-Pacific Consumer Products LP, Georgia-Pacific LLC, Fort James Operating Company and Fort James Corporation (collectively, "Georgia-Pacific"¹), as to the topics listed in Schedule A, annexed hereto.

The deposition will commence on October 26, 2011, at 9:00 a.m. at the offices of Latham & Watkins LLP, One Newark Center, 16th Floor, Newark, New Jersey 07101, before a

¹ "Georgia-Pacific" includes all entities referenced in Definition No. 7 of Plaintiff NCR Corporation's Interrogatories and Requests for the Production of Documents to Georgia-Pacific, dated April 4, 2011.

person duly authorized to administer oaths. The deposition will be videotaped and transcribed by stenographic means.

All parties are invited to attend and to participate if so desired.

Dated: September 29, 2011

Respectfully Submitted,

NCR CORPORATION

/s/ Evan B. Westerfield
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SCHEDULE A

1. The \$37,114,163.66 in costs claimed by GP, which were purportedly incurred and paid by GP under the November 2007 cleanup order issued by EPA (described as "106 Order Response Costs" in the Montney Declaration, No. 08-cv-16, Dkt. #900), including but not limited to the nature of the work or activities for which these costs were spent; the persons who were involved with the work or activities; the dates of the work or activities; the reasons why the work or activities were performed; and the documentation of these costs, the work or activities.

2. The \$5,228,900.28 in costs claimed by GP, which were purportedly incurred and paid by GP under the 2004 order issued by EPA (described as "Design Order Response Costs" in the Montney Declaration, No. 08-cv-16, Dkt. #Dkt. 900), including but not limited to the nature of the work or activities for which these costs were spent; the persons who were involved with the work or activities; the dates of the work or activities; the reasons why the work or activities were performed; and the documentation of these costs, the work or activities.

3. The \$8,213,962.29 in costs claimed by GP, which were purportedly incurred and paid by GP in completing the second phase of the SMU 56/57 dredging project (as described in the Montney Declaration, No. 08-cv-16, Dkt. #900), including but not limited to the nature of the work or activities for which these costs were spent; the persons who were involved with the work or activities; the dates of the work or activities; the reasons why the work or activities were performed; and the documentation of these costs, the work or activities.

4. The \$215,780.98 in costs claimed by GP, which were purportedly incurred and paid by GP for initial investigation, assessment and monitoring costs (as described in the Montney Declaration, No. 08-cv-16, Dkt. #900), including but not limited to the nature of the work or activities for which these costs were spent; the persons who were involved with the work

or activities; the dates of the work or activities; the reasons why the work or activities were performed; and the documentation of these costs, the work or activities.

5. The \$13,126,370.62 in costs claimed by GP, which were purportedly incurred and paid for by GP for natural resource damages (as described in the Montney Declaration, No. 08-cv-16, Dkt. #900), including but not limited to the nature of the work, activities, or property transactions, for which these costs were spent; the persons who involved with the work, property transactions, or activities; the dates of the work, activities, or property transaction; the reasons why the work, activities, or property transactions were performed; and the documentation of these costs, work, activities or property transactions.

6. The \$19,653,877.00 in costs claimed by GP, which were purportedly incurred and paid for by GP as part of the Fox River Group activities, including but not limited to the nature of the work or activities for which these costs were spent; the persons who were involved with the work or activities; the dates of the work or activities; the reasons why the work or activities were performed; the manner in which interest was calculated on these costs; and the documentation of these costs, the work or activities.

7. The \$7,000,000.00 in costs claimed by GP, which were purportedly incurred and paid for by GP under the Consent Decree approved by the Court on April 4, 2011 (No. 08-cv-16, Dkt. #2-1; Dkt. #130).

8. Any other costs that GP is seeking or may seek to recover to recover in the above-captioned action.

CERTIFICATE OF SERVICE

I, Margaret Sobota, an attorney, hereby certify that on September 29, 2011, I caused a copy of the foregoing Notice of Deposition to be served on the following counsel by electronic mail:

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/s/ Margaret Sobota

Margaret Sobota